Message

From: Stephanie Ma [stephanie.ma@tceq.texas.gov]

Sent: 8/19/2021 8:25:05 PM

To: Madden, Joshua [madden.joshua@epa.gov]

Subject: RE: Mimosa Dr. Monitor

Thanks Josh. It would be great if the Region 9 person would be willing to speak with us. Thanks.

From: Madden, Joshua <madden.joshua@epa.gov>

Sent: Thursday, August 19, 2021 8:48 AM

To: Stephanie Ma <stephanie.ma@tceq.texas.gov>

Subject: RE: Mimosa Dr. Monitor

Morning Stephanie,

Just to give you a little bit of an update, we had our monthly ambient air monitoring call yesterday and I brought up the situation at the Mimosa monitor. We received some advice and areas to look to assist us in finding a positive way to clear up this issue. I don't know exactly what site in Region 9 has the issue similar to Mimosa's but a representative from Region 9 did bring it up and explain that they had a construction issue near a monitor that caused an exceedance and that they are working to figure out how to apply an exceptional event to it. No real new information but it was good to hear of a similar issue. Sorry I don't have more for you right now. I will keep you informed of how the new areas of advice turn out and if they are applicable in this situation.

If you would like I can ask the Region 9 person if they would be willing to speak with you about how they are approaching their EE.

Josh

From: Stephanie Ma <stephanie.ma@tceq.texas.gov>

Sent: Thursday, August 12, 2021 2:25 PM

To: Madden, Joshua <madden.joshua@epa.gov>

Cc: julie.eldredge@tceq.texas.gov; Verhalen, Frances yerhalen.frances@epa.gov; Holly.Landuyt_tceq.texas.gov

<<u>Holly.Landuyt@tceq.texas.gov</u>>; Darrel Solanik <<u>Darrel.Solanik@tceq.texas.gov</u>>; Melanie Hotchkiss

<melanie.hotchkiss@tceq.texas.gov>; Scott Carpenter <Scott.Carpenter@tceq.texas.gov>

Subject: RE: Mimosa Dr. Monitor

Thanks Josh. Would you be able to tell us which site in Region 9 had the similar situation? Please let us know when you have additional information. I appreciate you looking into this. Thanks!

Thanks, Stephanie

From: Madden, Joshua < madden.joshua@epa.gov >

Sent: Thursday, August 12, 2021 1:28 PM

To: Stephanie Ma <stephanie.ma@tceq.texas.gov>

Cc: Julie Eldredge < Julie. Eldredge @Tceq. Texas. Gov>; Verhalen, Frances < verhalen. frances@epa.gov>; Holly Landuyt

<Holly.Landuyt@tceq.texas.gov>; Darrel Solanik <Darrel.Solanik@tceq.texas.gov>; Melanie Hotchkiss

<melanie.hotchkiss@tceq.texas.gov>; Scott Carpenter <Scott.Carpenter@tceq.texas.gov>

Subject: RE: Mimosa Dr. Monitor

Hi Stephanie,

I apologize but we don't have much to update you on yet. I double checked with our exceptional events coordinator at headquarters and there are no completed EE demonstrations attributed to man made events. So I don't have an guidance on what would need to into one. We do have a few calls next week with our EE group and we plan to bring this issue up with them for more guidance. As soon as we find out anything new I'll let you know.

Josh

From: Stephanie Ma <stephanie.ma@tceq.texas.gov>

Sent: Wednesday, August 11, 2021 10:27 AM **To:** Madden, Joshua <madden.joshua@epa.gov>

Cc: julie.eldredge@tceq.texas.gov; Verhalen, Frances <verhalen.frances@epa.gov>; Holly.Landuyt_tceq.texas.gov

<Holly.Landuyt@tceq.texas.gov>; Darrel Solanik <Darrel.Solanik@tceq.texas.gov>; Melanie Hotchkiss

<melanie.hotchkiss@tceq.texas.gov>; Scott Carpenter <Scott.Carpenter@tceq.texas.gov>

Subject: RE: Mimosa Dr. Monitor

Hi Josh,

Please let us know if you have any updates on the questions below. I can schedule a Teams call if you would like to discuss. Thanks.

Thanks, Stephanie

From: Stephanie Ma <stephanie.ma@tceq.texas.gov>

Sent: Wednesday, July 21, 2021 1:57 PM

To: Madden, Joshua <madden.joshua@epa.gov>

Cc: Julie Eldredge < Julie. Eldredge @Tceq. Texas. Gov >; Verhalen, Frances < verhalen. frances @epa.gov >; Holly Landuyt

<Holly.Landuyt@tceq.texas.gov>; Darrel Solanik <Darrel.Solanik@tceq.texas.gov>; Melanie Hotchkiss

<melanie.hotchkiss@tceq.texas.gov>; Weslee Copeland <weslee.copeland@tceq.texas.gov>; Scott Carpenter

<<u>Scott.Carpenter@tceq.texas.gov</u>>

Subject: RE: Mimosa Dr. Monitor

Hi Josh,

Thank you for the meeting and clarification to use the "J" flag instead of the "AC" flag. During our internal discussions, we had some additional questions come up about the exceptional events package. Could you please provide responses the questions below, or we would be happy to set up a meeting to discuss via Teams. TCEQ has not submitted a PM exceptional events package for manmade occurrences in the past, so we would appreciate any guidance you could provide. Our management is still considering this option. Thanks.

- 1. Is there any precedence for the submittal and approval of a PM exceptional events package due to a manmade occurrence? If so, can you please provide additional information? Was there any litigation associated with said package and approval?
- 2. What type of information would the EPA expect to see in this type of exceptional events package?
- 3. You mentioned during the call that Region 9 had a similar situation with a manmade occurrence. Has the Region 9 monitoring entity submitted an exceptional events package for their occurrence or do you have any additional information you can provide?

Thanks, Stephanie Ma Ambient Monitoring Section Manager Monitoring Division 512-791-9020 From: Madden, Joshua < madden.joshua@epa.gov >

Sent: Thursday, June 17, 2021 11:54 AM

To: Holly Landuyt < Holly.Landuyt@tceq.texas.gov>; Julie Eldredge < Julie.Eldredge@Tceq.Texas.Gov>

Cc: Verhalen, Frances < verhalen.frances@epa.gov>

Subject: Mimosa Dr. Monitor

Good Morning,

I hope this email finds everyone well. After several discussions with OAQPS and internal QA personal, we have come to the decision that it would be in TCEQ's best interest to submit an exceptional events package for the exceedance days at the Mimosa Dr. monitor for 2020. After further research and discussions we discovered that an exceptional event package can be submitted for a man made incident not likely to recur at a particular location. The appropriate flag for the exceedance days will still be the AC code. We ask that the AC code for non-exceedance days please be removed in AQS as this data is still considered good data. We ask that for non-exceedance days that the J (construction) information code be placed in AQS. This will appear beside the data, but not replace the data.

Holly I apologize to you for not catching this sooner when you originally inquired about an EE for this particular situation. The QA staff that I was working with and myself thought that the course of action we presented to you at the time with the AC null code was the correct path. Please let me know if I can be of any assistance with the EE package.

Joshua Madden

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